

**IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: NATIONAL FOOTBALL LEAGUE
PLAYERS' CONCUSSION INJURY LITIGATION

Kevin Turner and Shawn Wooden, on behalf of
themselves and others similarly situated,

Plaintiffs

v.

National Football League and NFL Properties, LLC,
successor-in-interest to NFL Properties, Inc.,

Defendants.

No. 2:12-md-02323-AB
MDL No. 2323

THIS DOCUMENT RELATES TO:
ALL ACTIONS

**MOTION FOR RELIEF UNDER ARTICLE XXVII OF THE SETTLEMENT
AGREEMENT OR FOR RELIEF FROM JUDGMENT**

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Movants Kevin Henry and Najeh Davenport, by their attorneys Zuckerman Spaeder LLP, Edward Stone Law P.C., and JR Wyatt Law PLLC, move for relief under Article XXVII of the Settlement Agreement or for relief from the underlying judgment. In support of this motion, Mr. Henry and Mr. Davenport rely on the points and authorities in the accompanying brief, which Plaintiffs submit herewith and incorporate herein in their entirety.

Movants respectfully request oral argument on this motion.

Dated: August 25, 2020

Respectfully submitted,

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* *Pro hac vice* applications forthcoming.

CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing was filed electronically with the Clerk of the Court on the 25th day of August 2020, to be served by operation of the Court's electronic filing system which sent notification of such filing via electronic mail to all counsel of record.

Dated: August 25, 2020

/s/ Steven N. Herman